

UNITED STATES OF AMERICA v. PATRICK BOYD and CHARLES BOYD
CASE NO. 24-CR-20255-DIMITROULEAS
DEFENDANT, CHARLIE BOYD'S, AMENDED EXHIBIT LIST

Exhibit #	Date Identified	Date Admitted	Objections and/or Stipulations	DESCRIPTION OF EXHIBIT	Beginning Bates #
#16CIV6228(PAE) - Southern District of New York					
1				USA/Dr. Paul Bellman v. Gilead (April 2025) Complaint In Intervention.pdf	CBOYD000001
2				USA/Dr. Paul Bellman v. Gilead (April 2025) Stipulation and Dismissal.pdf	CBOYD000026
#20CV24523 - Southern District of Florida					
3				DE 0 - Docket.pdf	CBOYD000056
4				DE 1 - Complaint.pdf	CBOYD000191
#21CV04106 - Eastern District of New York					
5				DE 0 - Docket.pdf	CBOYD000416
6				DE 1 - Complaint.pdf	CBOYD000685
7				DE 63 - Proposed Order to Show Cause for Contempt and Sanctions.pdf	CBOYD000767
8				DE 64 - Plaintiff's Memo of Law for Contempt and Sanctions.pdf	CBOYD000802
9				DE 98 - Plaintiff's Memo of Law Sanctions (Khaim, Blvd9229, Synergy, Vega).pdf	CBOYD000818

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10				DE 373 - Amended Counterclaims of Defts. Medicine Shoppe and S. Venkatesh.pdf	CBOYD000859
11				DE 778 - Corrected Fourth Amended Complaint.pdf	CBOYD000868
12				DE 899 - Safe Chain Defts. Response to Fourth Amended Complaint, Counter and Cross Claims.pdf	CBOYD001045
13				DE 945 - Fifth Amended Complaint.pdf	CBOYD005561
14				DE 1225 - Letter to Court Motion to Compel.pdf	CBOYD001390
15				DE 1225.6 - Hernandez Indictment.pdf	CBOYD001398
16				DE 1225.7 - Exhibit 3 Agreed Factual Basis.pdf	CBOYD001417
17				DE 1235 - Letter to Court Additional Support Motion to Compel.pdf	CBOYD001426
18				DE 1398 - Letter to Court Levitan Bankruptcy.pdf	CBOYD001432
19				DE 1589 - Status Report (Brosius.Levitan Money Transfer).pdf	CBOYD001442
20				DE 1601 - Letter to Court (Brosius Funds).pdf	CBOYD001483
21				DE 1608 - Declaration of Timothy Alan Waters.pdf	CBOYD001484

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#22CV01983 - Eastern District of New York					
22				DE 307 - Notice of Third Declaration of Christopher Trent.pdf	CBOYD001488
#19CR20674 - Southern District of Florida (Vega)					
23				DE 0 - Docket.pdf	CBOYD003993
24				DE 632 - Fourth Superseding Indictment.pdf	CBOYD004002
25				DE 732 - Factual Proffer.pdf	CBOYD004025
26				DE 733 - Plea Agreement.pdf	CBOYD004029
27				DE 758 - Judgment.pdf	CBOYD004034
28				DE 762 - Sentencing Hearing Transcript.pdf	CBOYD004041
#20CR00578 - District Court of New Jersey (Brosius)					
29				DE 0 - Docket.pdf	CBOYD004074
30				DE 1 - Indictment.pdf	CBOYD004101

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31				DE 18 - Courtroom Minutes.pdf	CBOYD004129
32				DE 19 - Conditions of Release.pdf	CBOYD004130
33				DE 20 - Appearance Bond.pdf	CBOYD004133
34				DE 24 - Courtroom Minutes.pdf	CBOYD004135
35				DE 49 - Scheduling Letter.pdf	CBOYD004137
36				DE 50 - Continuance Letter.pdf	CBOYD004138
37				DE 54 - PreTrial Motion Letter.pdf	CBOYD004139
38				DE 55 - Amended Scheduling Order.pdf	CBOYD004140
39				DE 62 - Notice of PreTrial Motions.pdf	CBOYD004142
40				DE 138 - Plea Agreement.pdf	CBOYD004170
41				DE 139 - Application for Permission to Enter Guilty Plea.pdf	CBOYD004181
42				DE 140 - Report & Recommendation.pdf	CBOYD004189

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43				DE 160 - Order Granting Report & Recommendation.pdf	CBOYD004191
44				DE 204 - Consent Motion to Continue Sentencing.pdf	CBOYD004192
45				DE 232 - Arrest Warrant.pdf	CBOYD004194
46				DE 236 - Consent Motion to Continue Sentencing.pdf	CBOYD004195
47				Plea Hearing Transcript (September 23, 2024)	N/A
				#20CR00580 - Eastern District of New York (Khaim)	
48				DE 0 - Docket.pdf	CBOYD004197
49				DE 1 - Indictment.pdf	CBOYD004940
50				DE 6 - Order of Detention Pending Trial.pdf	CBOYD004964
51				DE 9 - Order Setting Conditions of Release.pdf	CBOYD004965
52				DE 14 - Motion to Modify Conditions of Release.pdf	CBOYD004967
53				DE 32 - Superseding Indictment.pdf	CBOYD004969

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54				DE 35 - Motion to Travel Beyond Curfew.pdf	CBOYD004992
55				DE 130 - Sentencing Memo.pdf	CBOYD004994
56				DE 131 - Sentencing Memo.pdf	CBOYD005023
57				DE 134 - Judgment.pdf	CBOYD005034
58				DE 136 - Order of Restitution.pdf	CBOYD005045
#22CR00020 - Southern District of New York (Khaim)					
59				DE 0 - Docket.pdf	CBOYD005048
60				DE 1 - Indictment.pdf	CBOYD005075
61				DE 380 - Plea Hearing Transcript.pdf	CBOYD005108
62				DE 485 - Sentencing Submission.pdf	CBOYD005138
63				DE 491 - Sentencing Submission.pdf	CBOYD005172
64				DE 504 - Sentencing Hearing Transcript.pdf	CBOYD005231

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65				DE 558 - Amended Judgment.pdf	CBOYD005270
#22CR60129 - Southern District of Florida (Hernandez)					
66				DE 0 - Docket.pdf	CBOYD005277
67				DE 1 - Indictment.pdf	CBOYD005292
68				DE 81 - Plea Agreement.pdf	CBOYD005310
69				DE 82 - Agreed Factual Basis.pdf	CBOYD005326
70				DE 96 - Judgment.pdf	CBOYD005334
71				DE 109 - Motion to Reduce Sentence.pdf	CBOYD005341
72				DE 111 - Response to Motion to Reduce Sentence.pdf	CBOYD005343
#23CR00505 - District Court of New Jersey (Ralhan)					
73				DE 0 - Docket.pdf	CBOYD005347
74				DE 1 - Information.pdf	CBOYD005399

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75				DE 2 - Waiver of Indictment.pdf	CBOYD005411
76				DE 5 - Application for Permission Enter Guilty Plea.pdf	CBOYD005412
77				DE 6 - Plea Agreement.pdf	CBOYD005420
78				DE 7 - Order Setting Conditions of Release.pdf	CBOYD005430
				#23CR00511 - District of New Jersey (Diamantstein)	
79				DE 0 - Docket.pdf	CBOYD005433
80				DE 1 - Indictment.pdf	CBOYD005439
81				DE 3 - Minute Entry.pdf	CBOYD005457
82				DE 22 - Order Modifying Conditions of Release.pdf	CBOYD005458
83				DE 30 - Order Modifying Conditions of Release.pdf	CBOYD005459
84				DE 33 - Order Modifying Conditions of Release.pdf	CBOYD005460
85				DE 35 - Order Modifying Conditions of Release.pdf	CBOYD005461

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#23CR20264 - Southern District of Florida (Herrera)					
86				DE 0 - Docket.pdf	CBOYD005462
87				DE 1 - Information.pdf	CBOYD006468
88				DE 10 - Waiver of Indictment.pdf	CBOYD005505
89				DE 15 - Agreed Factual Basis.pdf	CBOYD005506
90				DE 19 - Response to PSR and Sentencing Memo.pdf	CBOYD005508
91				DE 23 - Judgment.pdf	CBOYD005537
92				DE 24 - Sentencing Transcript.pdf	CBOYD005544
#25CV00393 - Eastern District of New York (Levitan)					
93				DE 0 - Docket.pdf	CBOYD005750
94				DE 20 - Motion for Sanctions.pdf	CBOYD005765
95				DE 26 - Proposed First Amended Complaint.pdf	CBOYD005791

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96				DE 42 - Motion to Dismiss.pdf	CBOYD005813
97				DE 43 - Letter Motion to Stay Discovery.pdf	CBOYD005840
Opinions					
98				#11-CV-00941-EMC (Ninth Circuit).pdf	CBOYD001868
99				#CV03-04999-MJJ (Ninth Circuit).pdf	CBOYD001902
McKesson Documents					
100				Gilead v. Safe Chain - S. Mooney's McKesson Decl. (December 20, 2023).pdf	CBOYD001524
101				McKesson ROs to Safe Chain's Subpoena (November 21, 2023).pdf	CBOYD001528
102				MCKESSON_000003-MCKESSON_000031	CBOYD003931
Press Releases					
103				Attorney General James Secures Over \$200 Million from Gilead Sciences for Paying Illegal Kickbacks.pdf	CBOYD001921
104				District of Massachusetts _ Gilead Agrees to Pay \$97 Million to Resolve Allegations that it Paid Kickbacks through a Co-Pay Foundation _ United States Department of Justice.pdf	CBOYD001924

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105				Eastern District of New York _ Pharmacy Owners Sentenced for \$18M COVID-19 Health Care Fraud and Money Laundering Scheme _ United States Department of Justice.pdf	CBOYD001929
106				Levi & Korsinsky Investigates Possible Securities Fraud by Gilead Sciences, Inc.pdf	CBOYD001933
107				Office of Public Affairs _ Gilead Agrees To Pay \$97 Million To Resolve Alleged False Claims Act Liability For Paying Kickbacks _ United States Department of Justice.pdf	CBOYD001938
108				Office of Public Affairs _ Man Arrested for Allegedly Distributing Over \$230 Million of Adulterated HIV Medication _ United States Department of Justice.pdf	CBOYD001943
109				Southern District of Florida _ Owner of Pharmaceutical Company Pleads Guilty to Unlawful Distribution of \$60 Million in Diverted HIV Drugs _ United States Department of Justice.pdf	CBOYD001947
110				Southern District of New York _ 10 Defendants Indicted For Operating \$20 Million Black Market HIV Medication Fraud Scheme _ United States Department of Justice.pdf	CBOYD001951
111				Southern District of New York _ Two Men Charged In HIV Medication Fraud And Identity Theft Scheme _ United States Department of Justice.pdf	CBOYD001958
112				Southern District of New York _ U.S.pdf	CBOYD001966
				Safe Chain Employee Records	
113				Abbie Divilio.pdf	CBOYD002080
114				Carly Ogren.pdf	CBOYD002123
115				Courtney Ruark-Coleman.pdf	CBOYD002124

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116				Jon Atkinson.pdf	CBOYD002145
117				Jon Weed.pdf	CBOYD002179
118				Jonathan Nicholls.pdf	CBOYD002187
119				Kathleen Eberspacher.pdf	CBOYD002191
120				Kelsey Jones.pdf	CBOYD002197
121				Kendreas Ferdinand.pdf	CBOYD002207
122				Makenzie Towers a/k/a Kenzie Nalley.pdf	CBOYD002225
123				Dakota Flowers.pdf	CBOYD003064
				Miscellaneous Documents	
124				Drug Supply Chain Security Act (June 2021) Implementation Identification of Suspect Product and Notification.pdf	CBOYD001541
125				FDA Report to Congress (June 2001) The Prescription Drug Marketing Act.pdf	CBOYD001561
126				Gilead FDA Presentation.pdf	CBOYD001682

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127				Gilead-Sciences-2022-Annual-Report-Form-10-K.pdf	CBOYD001718
128				Guidance for Industry (March 2018) Standardization of Data and Documentation Practices for Product Tracing Guidance for Industry.pdf	CBOYD001831
129				Guidance for Industry (March 2023) DSCSA Definition of Suspect and Illegitimate Product.pdf	CBOYD001854
130				puerto-rico-exports.pdf	CBOYD001864
131		10/23		Zimet Letter to Abigail Divilio (February 13, 2025).pdf	CBOYD001866
132				Customer Complaint Form.pdf	CBOYD001973
133				FW_ Email Signature.pdf	CBOYD001976
134				FW_ Gear.pdf	CBOYD001978
135				Maryland Board of Pharmacy Inspection - APRIL 14, 2021.pdf	CBOYD001982
136				Pharma2017 (powerpoint).pdf	CBOYD002002
137				Safe Chain Brochure 1.pdf	CBOYD002048
138				Safe Chain End of Year Awards (2018).pdf	CBOYD002050

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139				Safe Chain Values.pdf	CBOYD002052
140				Safe Chain Brochure.pdf	CBOYD002055
141				Safeway Distributors Brochure.pdf	CBOYD002056
142				The 15-Minute Rule Email (Sept. 23, 2021).pdf	CBOYD002058
143				The 15-Minute Rule Email (Sept. 23, 2022).pdf	CBOYD002059
144				Timeline of Events (Last Updated by A. Divilio March 25, 2021).pdf	CBOYD002061
145				Vistage Host Presentation (Charlie Boyd).pdf	CBOYD002065
146				Meeting Notes - June 15, 2021	SCSRELATIVITY _0001331434
147				Manager Meeting Notes - June 22, 2021	SCSRELATIVITY _0001331501
148				Managers Meeting Notes - July 20, 2021	SCSRELATIVITY _0001333137
149				Manager Meeting Notes - September 21, 2020	SCSRELATIVITY _0001338566
150				Manager Meeting Notes - February 22, 2021	SCSRELATIVITY _0001338988

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151				Manager Meeting Notes - December 14, 2020	SCSRELATIVITY _0001339071
152				Manager Meeting Notes - October 19, 2020	SCSRELATIVITY _0001339161
153				Manager Meeting Notes - July 27, 2020	SCSRELATIVITY _0001339172
154				Manager Meeting Notes - August 31, 2020	SCSRELATIVITY _0001339188
155				Manager Meeting Notes ACTION ITEMS IN BOLD August 10, 2020	SCSRELATIVITY _0001339208
156				Manager Meeting Notes - December 21, 2020	SCSRELATIVITY _0001339233
157				Manager Meeting Notes - September 21, 2020	SCSRELATIVITY _0001339282
158				Manager Meeting Notes - September 14, 2020	SCSRELATIVITY _0001339326
159				Manager Meeting Notes - December 7, 2020	SCSRELATIVITY _0001341130
160		10/23		Manager Meeting Notes - December 12, 2020	SCSRELATIVITY _0001341136
161				Manager Meeting Notes - November 30, 2020	SCSRELATIVITY _0001341232
162				Manager Meeting Notes - February 15, 2021	SCSRELATIVITY _0001341380

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163				Manager Meeting - May 25, 2021	SCSRELATIVITY _0001341389
164				Manager Meeting Notes - June 8, 2021	SCSRELATIVITY _0001341393
165				COMPLIANCE Manager Meeting Notes June 1, 2021	SCSRELATIVITY _0001349398
166				Manager Meeting Notes - February 8, 2021	SCSRELATIVITY _0001349536
167				Manager Meeting Notes - June 1, 2021	SCSRELATIVITY _0001349581
168				Manager Meeting Notes - November 9, 2020	SCSRELATIVITY _0001350019
169				Manager Meeting Notes - July 6, 2021	SCSRELATIVITY _0001350341
170				Manager Meeting Notes - November 2, 2020	SCSRELATIVITY _0001350474
171				Manager Meeting Notes - June 1, 2021	SCSRELATIVITY _0001393205
172				Manager Meeting Notes ACTION ITEMS IN BOLD June 8, 2020	SCSRELATIVITY _0001402783
173				Manager Meeting Notes ACTION ITEMS IN BOLD August 17, 2020	SCSRELATIVITY _0001402809
174				Manager Meeting Notes ACTION ITEMS IN BOLD May 11, 2020	SCSRELATIVITY _0001402943

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175				Manager Meeting Notes ACTION ITEMS IN BOLD March 30, 2020	SCSRELATIVITY _0001403102
176				Manager Meeting Notes ACTION ITEMS IN BOLD July 6, 2020	SCSRELATIVITY _0001403122
177		10/23		WorldWide Pharma Sales Representation Agreement	CBOYD003972
178				Trial Witness Letters	CBOYD003960
179				Geoffrey Potter Featured in CNBC Segment on Counterfeit Drug Schemes	CBOYD005843
180				Memorandum Opinion (11.24.2020 - Ramierz v. Gilead Sciences, Inc.)	CBOYD005844
181				Office of Public Affairs _ Man Sentenced for Illegally Distributing Over \$16M of Adulterated HIV Medication _ United States Department of Justice	CBOYD005916
182				Southern District of Florida _ Owner of Pharmaceutical Company Pleads Guilty to Unlawful Distribution of \$60 Million in Diverted HIV Drugs _ United States Department of Justice	CBOYD005920
				Phone / Encrypted App Communications (Part 1)	
183				Adam Brosius-Dhruv Ralhan-John Pangiopulous-Mike Zangari (05.19.2020 - 05.28.2020)	ABWW00059297
184				Adam Brosius-Garrett Mellott-Mike Zangari (07.06.2020 - 02.04.2021)	ABWW00054237
185				Adam Brosius- Garrett Mellott-Peter Khaim (09.18.2020 - 05.06.2021)	ABWW00054348

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185A				https://www.justice.gov/usao-sdfl/pr/pharmaceutical-business-owner-sentenced-miami-role-prescription-medication-diversion	N/A
186				Adam Brosius-Peter Khaim (08.21.2020 - 05.21.2021)	ABWW00053899
187				Adam Brosius-Mike Zangari (03.05.2021)	ABWW00053894
188				Adam Brosius-Mike Zangari (01.17.2020 - 03.23.2021)	ABWW00054140
189				Adam Brosius-Garrett Mellott (01.03.2020 - 09.07.2021)	ABWW00053272
190				Adam Brosius and Peter Khaim WhatsApp (08.21.2020 - 11.06.2020)	Brosius Phone
				Safe Chain Documents	
191				New Employee Welcome Box	N/A
192				Vistage Host Presentation - Safe Chain Exterior	CYBOD002074
193				Vistage Host Presentation - Safe Chain Interior	CBOYD002075
194		10/23		Abbie Divilio Resignation Letter (12.30.2021)	CBOYD002086
195		10/23		Abigail Divilio Recommendation Text (04.07.2024)	CBOYD002087

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196		10/23		Zimet Letter to Abigail Divilio and Response (08.20.2025)	N/A
197				The 15-Minute Rule Email (Sept. 23, 2021)	CBOYD002058
198				The 15-Minute Rule Email (Sept. 23, 2022)	CBOYD002059
199				INTENTIONALLY LEFT BLANK	
200				Frier Levitt Communications (Part 1) Memo to Safe Chain Solutions from Martha Rumore (06.06.2020)	SCS-0000156170
201		10/23		Email from Abbie Divilio to Charles Boyd RE Licensing Question Frier Email Thread (10.30.2020)	N/A
202		10/23		From Charles Boyd to John Marrone RE: DSCSA timeline/Serialization (09.01.2020)	DOJ-PPM-0000118676
203		10/23		From Charles Boyd to Abbie Divilio FW: Gilead (PR-196084) (09.14.2020)	DOJ-PPM-0000119950
204				From Martha Rumore to Abbie Divilio RE: Biktaryv issue with a customer (02.04.2021)	DOJ-PPM-0000118470
205				From Martha Rumore to Abbie Divilio RE: Biktaryv issue with a customer (02.05.2021)	DOJ-PPM-0000118379
206				From Martha Rumore to Charles Boyd RE: Biktaryv (02.11.2021)	DOJ-PPM-0000117312

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207				From Martha Rumore to Charles Boyd FW: PR#213279 (02.15.2021)	DOJ-PPM-0000116136
208				From Martha Rumore to CB/AD FW: BIKTARVY Lots CCZCFA & CDFYCA (02.19.2021)	DOJ-PPM-000115643
209		10/23		From Charles Boyd to Martha Rumore RE: BIKTARVY Lots CCZCFA & CDFYCA (02.22.2021)	DOJ-PPM-0000115650
210		10/23		From Abbie Divilio to Marth Rumore RE: Safe Chain Response Letter PR213279 CCZCFA CCXKVA CDFYCA (02.23.2021)	DOJ-PPM-0000115997
210A				From Charles Boyd to Abbie Divilio/Martha Rumore RE: Safe Chain Response Letter PR213279 CCZCFA CCXKVA CDFYCA (02.23.2021)	DOJ-PPM-0000116249
211				From Abbie Divilio to Martha Rumore RE: Safe Chain Response Letter PR213279 CCZCFA CCXKVA CDFYCA (03.01.2021)	DOJ-PPM-0000115525
212				From Abbie Divilio to Martha Rumore RE: Safe Chain Response Letter PR213279 CCZCFA CCXKVA CDFYCA (03.02.2021)	DOJ-PPM-0000116348
213				From Abbie Divilio to Charles Boyd RE: Safe Chain Response Letter PR213279 CCZCFA CCXKVA CDFYCA (03.03.2021)	DOJ-PPM-0000116340
214				From Charles Boyd to Martha Rumore RE: narrative for Q17 on the form (03.26.2021)	DOJ-PPM-0000119699
215				From Adam Brosius to Pat Boyd Re: Gilead / Safe Chain - Call Follow Up (04.21.2021)	DOJ-PPM-0000116407
216				From Adam Brosius to Jesse Dresser Re: Gilead/SafeChain Attorney Client Privileged and Confidential (04.22.2021)	DOJ-PPM-0000116064
217		10/23		From Adam Brosius to Jesse Dresser Re: SafeChain - Draft Communication to Gilead (04.30.2021)	DOJ-PPM-0000116218

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218				From Pat Boyd to Charles Boyd FW: Final DRAFT Communication to Gilead	DOJ-PPM-0000117093
219				From Charles Boyd to Jesse Dresser RE: SafeChain - Draft email to Gilead (05.05.2021)	DOJ-PPM-0000119998
220				From Adam Brosius to Abbie Divilio Re: SafeChain - Draft email to Gilead (05.06.2021)	DOJ-PPM-0000116066
221				Email from Jason Gould to Bruze Zimet RE Frier Levitt Documentation (Colosi) (09.08.2025)	N/A
222				Email from Jason Gould to Bruce Zimet RE Document_20131127_001 (Memo) (09.08.2025)	N/A
Emails					
223				From Abbie Divilio to Blair Rosiello RE SOPs to format (04.02.2020)	SCSRELATIVITY_0001331342
224				To Melissa Hall from Compliance RE Case no. 17-0539A and B (06.12.2020)	SCSRELATIVITY_0001331123
225				From Abbie Divilio to Jenna Mellott RE: Boulevard 9229 T3s (07.09.2020)	SCSRELATIVITY_0001366042
226				From Mike Zangari to Adam Brosius/Compliance Re: Boulevard 9229 T3s (07.09.2020)	SCSRELATIVITY_0001339210
227				From Abbie Divilio to Quality Complaints RE: Gilead (PR-196084) (08.18.2020)	SCSRELATIVITY_0001341160
228				From Abbie Divilio to Quality Complaints RE: Gilead (PR-196084) (08.18.2020)	SCSRELATIVITY_0001341137

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229				From Clifford Won to Abbie Divilio RE: Gilead (PR-196084) (08.19.2020)	SCSRELATIVITY _0001341120
230				From Ryan Rusconi to Abbie Divilio RE: Lot number verification (08.09.2020)	SCSRELATIVITY _0001341330
231				From Charles Boyd to Quality Complaints RE: Gilead (PR-196084) (08.20.2020)	SCSRELATIVITY _0001341272
232				From Charles Boys to Quality Complaints RE: Gilead (PR-196084) (08.21.2020)	SCSRELATIVITY _0001341278
233				From Clifford Won to Charles Boyd RE: Gilead (PR-196084) (09.14.2020)	SCSRELATIVITY _0001341264
234				From Dakota Flowers to Quality Complaints RE: Gilead (PR-196084) (10.05.2020)	SCSRELATIVITY _0001341106
235				From Abbie Divilio to Quality Complaints RE: Gilead (PR-196084) (09.14.2020)	SCSRELATIVITY _0001341006
236				From Clifford Won to Compliance RE Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.05.2020)	SCSRELATIVITY _0001341081
237				From Dakota Flowers to Quality Complaints RE: Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.06.2020)	SCSRELATIVITY _0001341025
238				From Clifford Won to Compliance RE: Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.06.2020)	SCSRELATIVITY _0001432475
239				From Clifford Won to Compliance RE: Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.07.2020)	SCSRELATIVITY _0001427184
240				From Abbie Divilio to Quality Complaints RE: Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.07.2020)	SCSRELATIVITY _0001341237

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241				From Lori Mayall, Esq. to Compliance RE: Gilead Sciences BIKTARVY Inquiry (PR-200633) (10.09.2020)	SCSRELATIVITY_0001333932
242				From Charles Boyd to Compliance RE: Sale of Counterfeit BIKTARVY Lot # CCXKVA [GILEAD-LDMS.FID511078] (11.24.2020)	SCSRELATIVITY_0001336085
243				From Abbie Divilio to 9229Sales RE New T3 System (12.16.2020)	SCSRELATIVITY_0001402807
244				From Abbie Divilio to Charles Boyd FW: Transportation of RX products (03.01.2021)	SCSRELATIVITY_0001420155
245				From Abbie to Marty Garbarino RE: Compliance Questions (03.18.2021)	SCSRELATIVITY_0001427847
246				From Patrick Boyd to Compliance RE CM return (04.22.2021)	SCSRELATIVITY_0001405550
247				From Charles Boyd to Abbie Divilio RE: Safechain offer sheet (04.26.2021)	SCSRELATIVITY_0001341110
248				Email from Pete Colosi to Compliance RE: Sale of Counterfeit Biktary Lot #CCXKVA (11.23.2020)	SCSRELATIVITY_0001335709
249				Email from Martha Rumore to Charles Boyd RE: Gilead Final Letter (12.07.2020)	DOJ-PPM-0000115537
250				Email from Martha Rumore to AD/CB Re Safe Chain Response Letter of Nov 23 (12.08.2020)	DOJ-PPM-0000116219
251				Frier Levitt Billing Invoice (11.12.2020)	FL0001941
252				Email from Martha Rumore to CB/AD RE: Colosi (02.19.2021)	DOJ-PPM-0000115643

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253				Email from Anthony Berger to Jesse Dresser RE: Letter (04.20.2021)	DOJ-PPM-0000118487
254				Email from Martha Rumore to Jesse Dresser, CB/AD RE: Safe Chain Representation (04.20.2021)	DOJ-PPM-0000116042
255				Gilead Unanswered Emails RE: Exhibit 253	FL00003184
256				Email from Marth Rumore to CB/AB RE: Call with Gilead (04.20.2021)	DOJ-PPM-0000116496
257				Email from Martha Rumore to CB/AD/PB RE: FDA (04.21.2021)	DOJ-PPM-0000116217
258				Email from Jesse Dresser to CB/MR RE: Monitoring Lawsuit (05.04.2021)	DOJ-PPM-0000117018
259		10/23		Email from Martha Rumore to CB/JD/PT RE: AJC Case (05.04.2021)	DOJ-PPM-0000118579
260				Email from Anthony Berger to JD/MR and Others RE: Lawsuit (05.04.2021)	DOJ-PPM-0000118628
261				Email from Adam Brosius to JD.MR and Others RE: Lawsuit (05.04.2021)	DOJ-PPM-0000118606
262				Email from Marth Rumore to Charlie Boyd RE: Tardiness (05.26.2021)	DOJ-PPM-0000118885
263				Email from Marth Rumore to Charlie Boyd RE: Tardiness (2) (05.26.2021)	DOJ-PPM-0000118889
264				Email from Jesse Dresser to CB/MR/PB/TB RE: Gilead Subpoena (05.04.2021)	FL00009864

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265				Email from AB to CB/JH/MR RE: Gilead Subpoena (05.04.2021)	FL00009862
266				Email from Jesse Dresser to AB/CB/PB/MR RE: SafeChain Draft Email to Gilead	FL00009702
267				Email from Jesse Dresser to Levitt and Mizeski RE: Gilead Subpoena (05.04.2021)	FL00013629
268				Email from Martha to Jesse Dresser, AB,PB,CB RE: AJC Case	FL00006339
269				Article Link RE: FL00003669	N/A
270				Email from Jesse Dresser to MR/AB RE: Customer Search (05.04.2021)	FL0006333
271				Email from Martha Rumore to Frier Team RE: Subpoena to Safe Chain Solutions (05.05.2021)	FL00022247
272				Email from MR to Frier Team RE: Subpoena to Safe Chain Solutions (05.05.2021) REDACTED	FL00017863
273				Email from Abbie Divilio to Martha Rumore and Jesse Dresser RE: Gilead Subpoena Service (05.05.2021)	FL00003304
274				Email from Jesse Dresser to CB/AB/AB RE: Draft Email to Gilead (05.05.2021)	FL00009638
275				Email from Martha Rumore to Charles Boyd and Abbe Divilio RE: Biktaryv Issue, White Cross (01.04.2021)	DOJ-PPM-0000116912
276				Email from Martha Rumore to Abbie Divilio and Charles Boyd RE: Biktaryv issue with a customer (02.04.2021)	DOJ-PPM-0000118470

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277				Email from Marth Rumore to Abbie Divilio and Charles Boyd RE: Biktaryv issue with a customer (02.05.2021)	DOJ-PPM-0000118379
278				Email from Martha Rumore to Charles Boyd RE: Biktaryv issue with a customer (02.05.2021)	DOJ-PPM-0000118486
279				Email from Martha to CB/AD/AB/JD FW: Gilead Sciences (03.23.2021)	DOJ-PPM-0000116615
280				Email from Martha Rumore to JD, AD, AB, CB RE: Gentek information (03.24.2021)	DOJ-PPM-0000115885
281				Email from Jesse Dresser to PB,AD,AB,TB,CB Re: FDA form 3911 for review (03.25.2021)	DOJ-PPM-0000118773
282				Email from Martha Rumore to Jesse Dresser and Safe Chain RE: Meeting Follow Up (04.07.2021)	DOJ-PPM-0000116605
283				Email from Martha Rumore to Jesse Dresser and Safe Chain RE: Meeting Follow Up (04.07.2021)	DOJ-PPM-0000116612
284				Email from CB/PB to Martha Rumore, Abbie Divilio and Jesse Dresser RE: Rapids Tex invoices (04.12.2021)	DOJ-PPM-0000116913
285				Email from Martha Rumore to Jesse Dresser RE: Rapids Tex invoices (04.13.2021)	DOJ-PPM-0000115710
286				Email Tony Berger to Martha Rumore and Abbie Divilio Follow-Up (04.16.2021)	DOJ-PPM-0000121422
287				Email from Martha Rumore to Jesse Dresser and Charles Boyd RE: Gilead Next Steps: Attorney Client Privileged & Confidential (04.22.2021)	DOJ-PPM-0000117239
288				Email from Martha Rumore to Charles Boyd and Abbie Divilio RE: Email from Gilead (01.04.2021)	DOJ-PPM-0000116604

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289		10/23		Email from Abbie Divilio to Dakota Flowers RE: Gilead responses (03.21.2021)	DOJ-PPM-0000115444
290				Email from Abbie Divilio to Jesse Dresser and Martha Rumore FW: COMPLIANCE REQUEST: Order 7782 (04.12.2021)	DOJ-PPM-0000116207
291				Email from Martha Rumore to Jesse Dresser RE: Rapids Tex invoices (04.13.2021)	DOJ-PPM-0000116028
292				Email from Martha Rumore to Jesse Dresser RE: Rapids Tex invoices (04.14.2021)	DOJ-PPM-0000115482
293				Email from Charles Boyd to Abbie Divilio, Jesse Dresser and Marth Rumore Re: Rapids Tex invoices (04.14.2021)	DOJ-PPM-0000120223
294				Email from Tony Berger to Charles Boyd RE: Rapids Tex invoices (04.14.2021)	DOJ-PPM-0000119971
295				Email from Jesse Dresser to Safe Chain and Frier Team RE: Follow-Up (04.19.2021)	DOJ-PPM-0000118612
296				Email from Charles Boyd to Safe Chain and Frier Team FW: Invoice and T3 discrepancies to correct (04.19.2021)	DOJ-PPM-0000119870
297				Email from Charles Boyd to Martha Rumore RE: Gilead Correspondence (04.20.2021)	DOJ-PPM-0000119684
298				Email from Anthony Berger to Frier Team and Safe Chain RE: Gilead Correspondence (04.20.2021)	DOJ-PPM-0000118607
299				Email from Pat Boyd to Frier Team and Safe Chain RE: Call With Gilead (04.20.2021)	DOJ-PPM-0000117056
300				Email from Anthony Berger to Safe Chain and Frier Team RE: Gilead / Safe Chain (04.21.2021)	DOJ-PPM-0000116647

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301		10/23		Email from Abbie Divilio to Martha Rumore RE: vendor intake form (04.07.2021)	DOJ-PPM-0000118716
302				Email from Charles Boyd to Frier Team and Safe Chain RE: SafeChain - Mr. Unlimited Inventory (04.07.2021)	DOJ-PPM-0000119945
303				Email from Abbie Divilio to Safe Chain and Frier Team RE: Meeting Follow Up (04.08.2021)	DOJ-PPM-0000116657
304				Email from Abbie Divilio to Safe Chain and Frier Team RE; SYNERGY: COMPLIANCE REQUEST: Order 7782 (04.09.2021)	DOJ-PPM-0000116005
305				Email from Pat Boyd to Frier Team and Safe Chain FW: Invoice and T3 discrepancies to correct (07.26.2021)	DOJ-PPM-0000118963
306		10/23		Email from Abbie Divilio RE: NEW VENDOR - BOULEVARD 9229 (04.22.2020)	SCSRELATIVITY_0001339306
307		10/23		Email from Dakota Flowers RE: NEW VENDOR - GENTEK (06.12.2020)	SCSRELATIVITY_0001329905
308		10/23		Email from Abbie Divilio RE: New Wholesale Vendor (Synergy Group Wholesaler) (03.02.2021)	SCSRELATIVITY_0001349354
309				Email from Abbie Divilio to Garrett Mellott RE: packing list and T3's for inv 7764 (03.12.2021)	SCSRELATIVITY_0001402562
310		10/23		Email from Abbie Divilio FW: Safechain Vendor Application Omom (06.18.2021)	SCSRELATIVITY_0001333661
311		10/23		Email from Martha Rumore to Blvd9229 RE: Demand Letter (04.30.2021)	FL00020875
312		10/23		Email from Jesse Dresser to Synergy RE: Demand Letter (08.11.2021)	FL00024695

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313		10/23		Email from Martha Rumore to Safe Chain Team RE: Rapid Demand Letter (06.17.2021)	FL00007966
314		10/23		Email from Martha Rumore to Darry McNabb RE: Demand Letter to Rapids (06.21.2021)	FL00014345
315		10/23		Email from Jesse Dresser to OmomRX RE: Deman Letter (08.11.2021)	FL00024708
Additional Documents					
316				Sekar and Peter Khaim Messages (Exhibit 46 - Khaim Deposition)	N/A
317				Sekar and Peter Khaim Messages (Exhibit 47 - Khaim Deposition)	N/A
318				Declaration of Nathan Pinkhasov (Exhibit 81 - Khaim Deposition)	N/A
319				Khaim.Khaimov DOJ Proffer Letter (08.27.2025)	SCS-0000153903
320				Khaim.Khaimov DOJ Letter (10.07.2025)	N/A
Teams Messages					
321				Abbie Divilio and Jesse Hammett (12.23.2021)	SCSRELATIVITY_0000798191

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322				Abbie Divilio and Charles Boyd (06.02.2020)	SCSRELATIVITY _0000497627